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*Attorneys for Plaintiff and*

*Proposed Class Counsel*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**OAKLAND DIVISION**

PAMELA CHO, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

THE GAP, INC., a Delaware corporation,  
GAP (APPAREL) LLC, a California limited  
liability company, GAP INTERNATIONAL  
SALES, INC., a Delaware corporation, and  
DOES 1 – 50, inclusive,

Defendants.

Case No. 4:24-cv-05206-HSG

**JOINT STIPULATION AND  
ORDER TO EXTEND BRIEFING  
DEADLINES FOR DEFENDANTS'  
MOTION TO DISMISS (ECF NO. 6)**  
(as modified)

1       **PLEASE TAKE NOTICE** that, Pursuant to Civil Local Rules 6-1(a)-(b), 6.2 and 7-12,  
2 Plaintiff Pamela Cho, on behalf of herself and all others similarly situated (“Plaintiff”) and  
3 Defendants The Gap, Inc., Gap (Apparel) LLC, and Gap International Sales, Inc. (“Defendants” and,  
4 together with Plaintiff, the “Parties”) by and through their respective undersigned counsel, hereby  
5 submit the following Joint Stipulation to Extend Briefing Deadlines for Defendants’ motion to  
6 dismiss, and declare as follows:

7       **WHEREAS**, on July 12, 2024, Plaintiff filed a complaint in the Superior Court of California  
8 for the County of San Francisco with the case number CGC-24-616357, and Defendants were served  
9 on July 17, 2024;

10       **WHEREAS**, on August 15, 2024, Defendants removed the case to Federal Court. (ECF No.  
11 1);

12       **WHEREAS**, on August 20, 2024, Defendants filed a motion to dismiss pursuant to Federal  
13 Rules of Civil Procedure 12(b)(6) (the “Motion”), (ECF No. 6);

14       **WHEREAS**, Plaintiff’s response to the Motion is currently due September 3, 2024, and  
15 Defendants’ reply is due September 10, 2024;

16       **WHEREAS**, on August 23, 2024, this case was reassigned to this Court, and the hearing on  
17 the Motion was taken off calendar (ECF No. 16);

18       **WHEREAS**, the parties are concurrently exploring an informal resolution of this matter,  
19 including the possibility of attending private mediation;

20       **WHEREAS**, the Parties agree that an extension of the briefing schedule would provide  
21 appropriate time for Plaintiff to respond to the complex issues raised in the Motion as well as time  
22 for the parties to further explore the possibility of an informal resolution;

23       **WHEREAS**, the Parties have not previously requested any time modifications to the motion  
24 to dismiss briefing schedule or any other deadlines set by the Court.

25       **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the  
26 Parties, subject to Court approval, as follows:

27       1.       The deadline for Plaintiff to file her response to Defendants’ motion to dismiss is  
28 extended to September 26, 2024;

2. The deadline for Defendants to file their reply to Plaintiff's response is extended to October 10, 2024;

3. The hearing date for Defendants' motion to dismiss is to be set thereafter at the Court's convenience.

DATED: August 28, 2024

Respectfully submitted,

**LYNCH CARPENTER LLP**

/s/ Todd D. Carpenter

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DATED: August 28, 2024

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*Attorney for Defendants*

**Attestation of Concurrence of Signatories**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that all signatories listed above, and on whose behalf this filing is submitted, concur in the filing's content, and have authorized the filing.

Dated: August 28, 2024

**LYNCH CARPENTER LLP**

By: /s/ Todd D. Carpenter

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Proposed Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of August 2024, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

jason.russell@skadden.com

hillary.hamilton@skadden.com

michael.mctigue@skadden.com

meredith.slawe@skadden.com

And I hereby certify that I will mail the document by U.S. mail to the following non-filing user: NONE.

Dated: August 28, 2024

/s/ Todd D. Carpenter

Todd D. Carpenter


**ORDER**

Pursuant to the Parties' stipulation, the Court hereby orders as follows:

1. Plaintiff shall file her opposition to Defendants' motion to dismiss on or before September 26, 2024;
2. Defendants shall file their reply brief in support of the motion to dismiss on or before October 10, 2024;
3. The hearing date for Defendants' motion to dismiss is set for October 24, 2024 at 2:00 p.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 8/29/2024

  
Honorable Haywood S. Gilliam, Jr.  
United States District Judge